

EXHIBIT 2

Kathleen Sullivan (SBN 242261)
 kathleensullivan@quinnemanuel.com
 QUINN EMANUEL URQUHART &
 SULLIVAN LLP
 51 Madison Avenue, 22nd Floor
 New York, NY 10010
 Telephone: (212) 849-7000
 Facsimile: (212) 849-7100

Sean S. Pak (SBN 219032)
 seanpak@quinnemanuel.com
 John M. Neukom (SBN 275887)
 johnneukom@quinnemanuel.com.
 QUINN EMANUEL URQUHART &
 SULLIVAN LLP
 50 California Street, 22nd Floor
 San Francisco, CA 94111
 Telephone: (415) 875-6600
 Facsimile: (415) 875-6700

Mark Tung (SBN 245782)
 marktung@quinnemanuel.com
 QUINN EMANUEL URQUHART &
 SULLIVAN LLP
 555 Twin Dolphin Drive, 5th Floor
 Redwood Shores, CA 94065
 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

Steven Cherny (admitted *pro hac vice*)
 steven.cherny@kirkland.com
 KIRKLAND & ELLIS LLP
 601 Lexington Avenue
 New York, New York 10022
 Telephone: (212) 446-4800
 Facsimile: (212) 446-4900

Adam R. Alper (SBN 196834)
 adam.alper@kirkland.com
 KIRKLAND & ELLIS LLP
 555 California Street
 San Francisco, California 94104
 Telephone: (415) 439-1400
 Facsimile: (415) 439-1500

Michael W. De Vries (SBN 211001)
 michael.devries@kirkland.com
 KIRKLAND & ELLIS LLP
 333 South Hope Street
 Los Angeles, California 90071
 Telephone: (213) 680-8400
 Facsimile: (213) 680-8500

Attorneys for Plaintiff Cisco Systems, Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CISCO SYSTEMS, INC.,

Plaintiff,

v.

ARISTA NETWORKS, INC.,

Defendant.

CASE NO. 5:14-cv-05344-BLF

**PLAINTIFF CISCO SYSTEMS, INC.'S
 SUPPLEMENTAL OBJECTIONS AND
 RESPONSES TO DEFENDANT
 ARISTA NETWORKS, INC.'S
 INTERROGATORY NOS. 2-10**

1 earliest operating system (product) that contained each command expression, and the date on
2 which each such operating system was first distributed. Pursuant to Fed. R. Civ. P. 33(d), Cisco
3 additionally refers Arista to the documents cited in its supplemental responses to Arista's
4 Interrogatory No. 16, including source code and documents identified by Bates number.

5 Cisco's discovery efforts in this case are ongoing, and Cisco reserves the right to further
6 supplement this response in light of facts learned during discovery, including information
7 regarding Arista's accused products and expert discovery.

8
9 **FOURTH SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5:**

10 Subject to and without waiver of its general and specific objections, Cisco further responds
11 as follows:

12 Cisco incorporates by reference its responses (and all supplements and exhibits) to
13 Interrogatory Nos. 24 and 25.

14 Insofar as Arista is asking whether Cisco took its CLI commands from third parties—for
15 example, third parties using the same multi-word commands as those implemented by Cisco in
16 IOS—Cisco also incorporates by reference its responses to Interrogatory Nos. 8, 16, 19 and 22.
17 Cisco also incorporates by reference the deposition testimony of the following witnesses: Kirk
18 Loughheed; Abhay Roy; Adam Sweeney; Anthony Li; Devadas Patil; Greg Satz; Hugh Holbrook;
19 Phillip Remaker; Ramanathan Kavasseri; and Tong Liu.

20 Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore
21 reserves the right to supplement this response as additional information becomes available,
22 including information that may be the subject of expert testimony and expert discovery.

23
24 **INTERROGATORY NO. 5:**

25 Identify with specificity each copyrighted work (by copyright and registration number) that
26 You contend Arista has unlawfully copied.

RESPONSE TO INTERROGATORY NO. 5:

Cisco incorporates by reference its General Objections as though fully set forth herein. Cisco further objects to this interrogatory on the grounds that it is needlessly duplicative of other interrogatories, including Interrogatory No. 2. Cisco also objects to this interrogatory as undefined, vague, ambiguous, overbroad, and unduly burdensome in its use of the terms “by copyright and registration number” and “unlawfully copied.” Cisco further objects to this interrogatory to the extent it seeks information that is protected by the attorney-client privilege, that constitutes attorney work-product, or that is protected by any other applicable privilege, protection, or immunity, including without limitation in connection with the common interest doctrine.

Subject to and without waiver of its general and specific objections, Cisco incorporates by reference, as if fully set forth herein, its operative complaint (and any subsequent amendments thereto) and all documents cited therein. Cisco further responds, pursuant to Fed. R. Civ. P. 33(d), that Cisco will produce documents containing information responsive to this interrogatory, which information may be obtained from the documents by Arista as easily as by Cisco. Cisco further responds that Arista has infringed at least Cisco’s copyrights in the following works:

<u>Copyrighted Work Infringed by Arista</u>	<u>Registration Number(s)</u>
Cisco IOS 11.0	TXu 1-036-057
Cisco IOS 11.1 (including supplement)	TX 5-531-435; TXu1-048-569
Cisco IOS 11.2	TXu1-036-063
Cisco IOS 11.3 (including supplement)	TXu1-036-062; TXu1-057-804
Cisco IOS 12.0 (including supplement)	TXu1-036-064; TXu1-057-805
Cisco IOS 12.1 (including supplement)	TXu1-036-066; TXu1-057-807
Cisco IOS 12.2 (including supplement)	TXu1-036-065; TXu1-057-806
Cisco IOS 12.3	TXu1-188-975
Cisco IOS 12.4	TXu1-259-162
Cisco IOS 15.0	TX 7-938-524
Cisco IOS 15.1	TX 7-938-525
Cisco IOS 15.2	TX 7-937-159
Cisco IOS 15.4	TX 7-938-341
Cisco IOS XR 3.0	TXu1-237-896
Cisco IOS XR 3.2	TXu1-270-592
Cisco IOS XR 3.3	TXu1-336-997
Cisco IOS XR 3.4	TXu1-344-750
Cisco IOS XR 3.5	TXu1-592-305

Copyrighted Work Infringed by Arista	Registration Number(s)
Cisco IOS XR 4.3	TX 7-933-364
Cisco IOS XR 5.2	TX 7-933-353
Cisco IOS XE 2.1	TX 7-937-240
Cisco IOS XE 3.5	TX 7-937-234
Cisco NX OS 4.0	TX 7-940-713
Cisco NX OS 5.0	TX 7-940-718
Cisco NX OS 5.2	TX 7-940-727
Cisco NX OS 6.2	TX 7-940-722

Cisco's discovery efforts in this case are ongoing, and Cisco reserves the right to further supplement this response in light of facts learned during discovery, including information regarding Arista's accused products.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6:

Subject to and without waiver of its general and specific objections, Cisco further responds as follows:

Cisco identifies at least the following documents and testimony as containing responsive information: Deposition Testimony of Phillip Remaker, Tong Liu, Abhay Roy, Kenneth Duda, Philip Shafer, Anthony Li, Greg Satz, and Kirk Loughheed.

Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore reserves the right to supplement this response as additional information becomes available, including information that may be the subject of expert testimony and expert discovery.

INTERROGATORY NO. 6:

Identify with specificity each Arista CLI Command that You contend infringes any copyrighted work identified in your response to Arista's Interrogatory No. 6, identify which work(s) it infringes, and explain in detail how each infringes.

RESPONSE TO INTERROGATORY NO. 6:

Cisco incorporates by reference its General Objections as though fully set forth herein. Cisco further objects to this interrogatory on the grounds that it is needlessly duplicative of other

01010072-CSI-CLI-01010347, CSI-CLI-01010348-CSI-CLI-01011702, CSI-CLI-01011703-CSI-
 CLI-01012066, CSI-CLI-01012067-CSI-CLI-01012355, CSI-CLI-01012356-CSI-CLI-01016323,
 CSI-CLI-01016330-CSI-CLI-01017570, CSI-CLI-01017571-CSI-CLI-01017816, CSI-CLI-
 01017817-CSI-CLI-01018442, CSI-CLI-01018443-CSI-CLI-01020174, CSI-CLI-01020175-CSI-
 CLI-01021530, CSI-CLI-01021531-CSI-CLI-01022293, CSI-CLI-01022294-CSI-CLI-01024115,
 CSI-CLI-01024116-CSI-CLI-01026323, CSI-CLI-01026324-CSI-CLI-01026761, CSI-CLI-
 01026762-CSI-CLI-01028393, CSI-CLI-01028394-CSI-CLI-01028687, CSI-CLI-01028688-CSI-
 CLI-01029723, CSI-CLI-01030760-CSI-CLI-01031005, CSI-CLI-01031006-CSI-CLI-01031136,
 CSI-CLI-01031137-CSI-CLI-01033756, CSI-CLI-01033757-CSI-CLI-01036302, CSI-CLI-
 01036303-CSI-CLI-01038556, CSI-CLI-01036303-CSI-CLI-01038556, CSI-CLI-01038557-CSI-
 CLI-01039330, CSI-CLI-01039331-CSI-CLI-01041106, CSI-CLI-01042983-CSI-CLI-01044384,
 CSI-CLI-01044385-CSI-CLI-01045982, CSI-CLI-01045983-CSI-CLI-01046296, CSI-CLI-
 01046297-CSI-CLI-01049592, CSI-CLI-01049593- CSI-CLI-01049801, CSI-CLI-01049802-CSI-
 CLI-01050104, CSI-CLI-01050105-CSI-CLI-01050634, CSI-CLI-01050635-CSI-CLI-01051202,
 CSI-CLI-01051203-CSI-CLI-01051418, CSI-CLI-01051419-CSI-CLI-01051565, CSI-CLI-
 01051566-CSI-CLI-01051605, CSI-CLI-01051606-CSI-CLI-01052137, CSI-CLI-01052138-CSI-
 CLI-01052341, CSI-CLI-01052342-CSI-CLI-01052547, CSI-CLI-01052548-CSI-CLI-01052797,
 CSI-CLI-01052798-CSI-CLI-01052993, CSI-CLI-01052994-CSI-CLI-01053577, CSI-CLI-
 01053578-CSI-CLI-01053763, CSI-CLI-01053764-CSI-CLI-01053821, CSI-CLI-01053822-CSI-
 CLI-01053932, CSI-CLI-01053933-CSI-CLI-01054026, CSI-CLI-01054027-CSI-CLI-01054122,
 CSI-CLI-01054123-CSI-CLI-01054235, CSI-CLI-01054236-CSI-CLI-01059274, CSI-CLI-
 01059275-CSI-CLI-01060223, CSI-CLI-01060224-CSI-CLI-01062264, CSI-CLI-01062265-CSI-
 CLI-01064584, CSI-CLI-01064585-CSI-CLI-01065152, CSI-CLI-01065153-CSI-CLI-01066352.

Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore reserves the right to supplement this response as additional information becomes available.

DATED: May 27, 2016

Respectfully submitted,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Sean S. Pak

Kathleen Sullivan (SBN 242261)
kathleensullivan@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Sean S. Pak (SBN 219032)
seanpak@quinnemanuel.com
John M. Neukom (SBN 275887)
johnneukom@quinnemanuel.com.
QUINN EMANUEL URQUHART &
SULLIVAN LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Mark Tung (SBN 245782)
marktung@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Steven Cherny (admitted *pro hac vice*)
steven.cherny@kirkland.com
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Adam R. Alper (SBN 196834)
adam.alper@kirkland.com
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, California 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500

Michael W. De Vries (SBN 211001)
michael.devries@kirkland.com
KIRKLAND & ELLIS LLP
333 South Hope Street
Los Angeles, California 90071
Telephone: (213) 680-8400

Facsimile: (213) 680-8500

Attorneys for Plaintiff Cisco Systems, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I hereby certify that, at the date entered below and per the agreement of the parties, I caused a true and correct copy of the foregoing to be served by transmission via electronic mail, made available to counsel at the email addresses below:

Juanita R. Brooks
brooks@fr.com
Fish & Richardson P.C.
12390 El Camino Real
San Diego, CA 92130-2081

Kelly C. Hunsaker
hunsaker@fr.com
Fish & Richardson PC
500 Arguello Street, Suite 500
Redwood City, CA 94063

Ruffin B. Cordell
cordell@fr.com
Lauren A. Degnan
degan@fr.com
Michael J. McKeon
mckeon@fr.com
Fish & Richardson PC
1425 K Street NW
11th Floor
Washington, DC 20005

Brian L. Ferrall
blf@kvn.com
Michael S. Kwun
mkwun@kvn.com
David J. Silbert
djs@kvn.com
Robert Van Nest
rvannest@kvn.com
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111-1809

Susan Chreighton
screighton@wsgr.com
Scott Andrew Sher
ssher@wsgr.com
Wilson Sonsini Goodrich Rosati
1700 K Street
Washington, DC 20006

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 27, 2016, at San Francisco, California.

/s/ Catherine R. Lacey

Catherine R. Lacey